

TENANT-BASED RENTAL ASSISTANCE (TBRA) PROGRAM MANUAL UPDATE MEETING

FEBRUARY 25, 2022



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AGENDA

- TBRA Program Manual Updates
- Documentation Examples
- Friendly Reminders
- Questions



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TBRA PROGRAM MANUAL – RENTAL ASSISTANCE TIMEFRAME (1)

- In Chapter 3: Program Requirement, under Eligible Services (page 14), DEHCR has modified the rental assistance term:
 - Rental assistance;
 - The term of rental assistance with HOME funds may not exceed 24 months; however, contracts can be renewed, subject to the availability of HOME funds.
- Clients' TBRA rental assistance contracts can be renewed for another 24-month period, without the approval of DEHCR staff, on condition that the agency has funding available.
- Grantees must continue their attempts to move their client into permanent housing.



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TBRA PROGRAM MANUAL – RENTAL ASSISTANCE TIMEFRAME (2)

- In order to renew a client's TBRA rental assistance contract, Chapter 5: Unit Characteristics and Lease Provisions, under Lease and Program Duration (page 28) requires grantees to complete the following items:
 - Recertify client's income and rent subsidy calculation
 - State why the client needs to maintain their TBRA assistance beyond 24 months and
 - Explain and document how they are attempting to move the client into permanent housing
- TBRA grantees must follow the same procedures as if the client was a new applicant.



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TBRA PROGRAM MANUAL – FMR STANDARD FLEXIBILITY (1)

- In Chapter 4: Income and Rent Calculation, under Administering Rent Payment Standards (page 21-22), DEHCR has added a flexibility related the Fair Market Rent (FMR) standard.

ADMINISTERING RENT PAYMENT STANDARDS

Once established, the payment standard must remain constant for all units during the grantee's program year. However, HUD does allow the grantee some flexibility regarding the administration of their established payment standard.



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TBRA PROGRAM MANUAL – FMR STANDARD FLEXIBILITY (2)

- TBRA grantees can approve a unit-specific payment standard for 20% of their total TBRA units. The unit-specific payment standard cannot exceed 10%.
 - XYZ Agency has a total of 200 assisted families in their TBRA program. Of those 200 units, up to 40 units (20%) can utilize the modified rent standard. If the FMR standard for a two-bedroom apartment costs \$1,000, the grantee could approve an apartment ranging between \$1,000 and \$1,100.
- Addresses discrepancies between the published FMR and the local housing market.
- Provides the ability to obtain units adapted for handicapped residents or larger families that may be more difficult to place.



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TBRA PROGRAM MANUAL – FMR STANDARD FLEXIBILITY (3)

- If a grantee utilizes the payment standard flexibility, they must document the following items:

- Document the established payment standard and the unit-specific standard applied in the client's TBRA file;
- List the total number of units currently participating in TBRA program; and
- List the total number of units utilizing the flexibility, the established payment standard, and the unit-specific standard applied.



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TBRA PROGRAM MANUAL – UNIT ABSENCES (1)

- In Chapter 6: Ongoing Administration, under Unit Absences (page 31), DEHCR has included an additional flexibility:

UNIT ABSENCES

Grantees are allowed to maintain a client's TBRA assistance in the event of a prolonged absence from their unit, up to 180 consecutive calendar days as stated in 24 CFR 982.312.



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TBRA PROGRAM MANUAL – UNIT ABSENCES (2)

- A prolonged absence from a TBRA unit could range from an unexpected hospitalization event to incarceration.
- Grantees can terminate a TBRA assistance contract if the client exceeds the absence of unit timeframe.
 - The termination must be recorded, dated and retained in the client’s file.



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TBRA PROGRAM MANUAL – CLIENT FILES/CHECKLIST

- In Chapter 3: Program Requirement, under Client Applications (page 16), DEHCR has included two, new documents:

OTHER DOCUMENTATION	
	Termination and Grievance Policy
	VAWA Notification
	Releases of Information for All Household Adults (program and Clarity)
	Annual Income Recertification and 3 rd Party Income Documents (if applicable)
	Annual HQS Re-inspection (must be passed) (if applicable)
	Contract Renewal Explanation and Timeframe (over 24 months) (if applicable)
	Fair Market Rent Flexibility Issuance (if applicable)



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DOCUMENTATION EXAMPLE – CONTRACT RENEWAL EXTENSION & TIMEFRAME (1)

- As previously stated, three items are required to complete the contract renewal process:
 - Recertify client’s income and rent subsidy calculation
 - State why the client needs to maintain their TBRA assistance beyond 24 months
 - Explain and document how they are attempting to move the client into permanent housing
- Continue to use your agency’s income determination and rent calculation forms that are already in place.



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DOCUMENTATION EXAMPLE – CONTRACT RENEWAL EXTENSION & TIMEFRAME (2)

- For the other two requirements, they could be included within the TBRA application:
 - Question #1: Is your household reapplying for TBRA assistance beyond the initial 24-month duration? (Yes/No)
 - Question #2: Explain why your household is reapplying for TBRA assistance beyond the initial 24-month duration.
 - Question #3: Explain how your household is making every effort to find permanent housing solutions.



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DOCUMENTATION EXAMPLE – CONTRACT RENEWAL EXTENSION & TIMEFRAME (3)

- Another option would be to create a simplified document to incorporate into clients' files:

Q1	What are the client's original TBRA assistance dates?	<input type="text"/>
Q2	A) Is your client's household reapplying for TBRA assistance beyond the initial 24- month period?	<input type="text"/>
	B) If yes, what is the proposed contract renewal duration? (up to 24 months)	<input type="text"/>
	C) Explain why does your TBRA client need to maintain their assistance beyond the 24-month period.	<input type="text"/>
Q3	Explain your agency's efforts to move the client to a more permanent housing solution.	<input type="text"/>



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DOCUMENTATION EXAMPLE – FMR FLEXIBILITY (1)

- As previously stated, three items are required to utilize the FMR flexibility:
 - Document the established payment standard and the unit-specific standard applied in the client's TBRA file
 - List the total number of units currently participating in the TBRA program
 - List the total number of units utilizing the flexibility, the established payment standard and the unit-specific standard applied
- Document the unit-specific standard that was applied to the Fair Market Rent Assessment Form.



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DOCUMENTATION EXAMPLE – FMR FLEXIBILITY (2)

- For the other two requirements, they can be expanded on the information gathered in the TBRA application:

Bedroom Size	Fair Market Rent (FMR)	FMR Flexibility (10%)	Rent Reasonableness*	Number of Units
Efficiency				
1 bedroom				
2 bedroom				
3 bedroom				
4 bedroom				

*Rent reasonableness is the preferred method of setting rent limits. However, these rents must also be below Fair Market Rent for your area.



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DOCUMENTATION EXAMPLE – FMR FLEXIBILITY (3)

Last Name	# of Bedrooms	City Location	Fair Market Rent (FMR)	FMR Flexibility Range (10%)	Rent Reasonableness*



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FRIENDLY REMINDERS

- Submit TBRA payment requests on a monthly basis
 - Admin costs should be no more than 10% of the assistance costs
- Need to list all current clients on the TBRA beneficiary form once your agency starts spending down their 2021-2023 contract funding.
- Continue to make an effort to provide 25% match
- In-person monitorings will start in early summer
- Unique entity identifier (UEI) number will be the new means of entity identification for federal awards



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QUESTIONS?



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